

-UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

UNITED STATES OF AMERICA

v.

MIGUEL MUNOZ,
a/k/a "zuru_61,"

Defendant.

24mj4101

SEALED COMPLAINT

Violation of 18 U.S.C. § 875(d)

COUNTY OF OFFENSE:
ORANGE

SOUTHERN DISTRICT OF NEW YORK, ss.:

BRIAN T. JENNINGS, being duly sworn, deposes and says that he is a Special Agent with the Federal Bureau of Investigation ("FBI"), and charges as follows:

COUNT ONE

(Extortionate Interstate Communications)

1. On or about May 18, 2024, in the Southern District of new York and elsewhere, MIGUEL MUNOZ, a/k/a "zuru_61," the defendant, knowingly and with intent to extort things of value from a person, did transmit in interstate commerce a communication containing a threat to injure the reputation of another person, to wit, MUNOZ sent text messages to a 17-year-old minor ("Victim-1") in Orange County, New York, threatening to distribute sexually explicit images and videos of Victim-1 if Victim-1 did not send him sexually explicit videos via Snapchat.

(Title 18, United States Code, Section 875(d).)

The bases for my knowledge and for the foregoing charges are, in part, as follows:

2. I am a Special Agent with the FBI, assigned to the Hudson Valley Safe Streets Task Force, and I have been personally involved in the investigation of this matter. This affidavit is based on, among other things, my conversations with law enforcement officers and others, my examination of documents and reports, and my involvement in this investigation. Because this affidavit is being submitted for the limited purpose of establishing probable cause, it does not include all the facts that I have learned during the course of my investigation. Where the contents of documents and the actions, statements, and conversations of others are reported herein, they are reported in substance and in part unless indicated otherwise.

3. Based on my experience and training, I am familiar with a free-access social networking application named "Snapchat." Snapchat allows users to establish accounts with Snapchat, which they can use to share photos, videos, messages, audio notes, and video notes with other Snapchat users. Snapchat's users may share "Snaps." A user takes a photo or video using their camera phone in real-time, which then can be sent to their friends on the social networking application. Unless the sender or recipient opts to save the photo or video, the message will be

deleted from their devices (after the content is sent in the case of the sender and after it is opened in the case of the recipient).

4. On or about May 18, 2024, the FBI received a report concerning contact between a 17-year-old girl ("Victim-1") located in Orange County, New York, and a person who used the Snapchat username "zuru_61." I then interviewed Victim-1, who provided the following information, in substance and in part:

a. On or about May 18, 2024, while Victim-1 was in the Southern District of New York, she received a text message from someone using the cellphone number ending in 0838 (the "0838 Number"), containing sexually explicit images and videos of Victim-1. The sender then threatened to release the images and videos unless Victim-1 added the username "zuru_61," on Snapchat. The messages stated:

Victim-1: How tf did you get this

Victim-1: This is child pornograohy [sic] so have fun explaining this to the cops

0838 Number: If you don't want me to expose you or expose your information then you better listen.

0838 Number: lol the cops won't help you.

Victim-1: They can

Victim-1: This is child pornograohy [sic]

0838 Number: Plus I have cop friends who can back me up.

Victim-1: I do too

Victim-1: So what do you want

0838 Number: Are you going to listen or do you want me to just expose everything right now?

Victim-1: What do you want

0838 Number: It'll be quick and easy. I want you to add me on snap. We'll call and you'll do some things for me on camera. After that I won't bother you and I'll delete everything I have of you.

b. Victim-1 added zuru_61 on Snapchat. Once added, zuru_61 called Victim-1 via Snapchat audio call, but no audio exchange occurred, and Victim-1 ended the call.

c. The 0838 Number then sent Victim-1 three sexually explicit videos of Victim-1. The videos depict: (1) a nude pubescent female touching and gripping her breasts; (2) the same female, nude, touching her vagina; and (3) the same female, nude,

placing her hand in her mouth. Victim-1 did not recall sending the videos to anyone and does not know when they were taken, but she verified that the videos were of her and said that she believes the videos may have been taken within the last year.

5. Victim-1 provided law enforcement agents with screenshots of her text messaging exchange with the 0838 Number. I reviewed the screenshots, which appeared to contain thumbnail images of Victim-1 nude. Victim-1 confirmed that Victim-1 created the screenshots and that they showed messages to and from the 0838 Number and content that the 0838 Number sent to Victim-1.

6. Based on my review of records obtained from Snapchat pursuant to a court-authorized search warrant, I learned that on or about May 18, 2024, shortly after Victim-1 added zuru_61 on Snapchat, zuru_61 messaged Victim-1 via Snapchat's direct messaging feature and demanded that Victim-1 send additional photos. Among other messages, zuru_61 wrote, "I'm guessing you want me to expose you right now," "Apologize to me right now slut or I'm sending it all over New York right now," and "since you wanna start doubting me I guess you want me to start showing people your nudes."

7. Based on my review of records from TextNow, I learned that the 0838 Number is registered to the username "miguelmunoz50" and is associated with a particular iCloud email address (the "iCloud Account") and a particular IP address (the "IP Address").

8. Based on my review of records from Apple, I learned that the iCloud Account is registered to MIGUEL MUNOZ, a/k/a "zuru_61," the defendant, and is associated with the IP Address.

9. Based on my review of records provided by Snapchat, I learned that the username "zuru_61" is associated with a particular Gmail address (the "Gmail Account") and the IP Address.

10. Based on my review of records from Google, I learned that the Gmail Account is registered to MIGUEL MUNOZ, a/k/a "zuru_61," the defendant, and is associated with the IP Address.

11. Based on my review of records from CSC Holdings (Optimum), I learned that the IP Address is registered to a particular address in or about Paterson, New Jersey (the "Paterson Address"). I performed a search on a law enforcement database and learned that MUNOZ lives at the same address.


12. On or about October 24, 2024, I traveled to the Paterson Address. MIGUEL MUNOZ, a/k/a "zuru_61," the defendant, was at the residence. I conducted an interview of MIGUEL MUNOZ, a/k/a "zuru_61," the defendant. MUNOZ stated, in substance and in part, that he had previously communicated with Victim-1 through social media and that he used the 0838 Number to threaten Victim-1 because he wanted Victim-1 to send him sexually explicit images and/or videos.

WHEREFORE, I respectfully request that a warrant be issued for the arrest of MIGUEL MUNOZ, a/k/a "zuru_61," the defendant, and that he be arrested, and imprisoned or bailed, as the case may be.

/s/ Brian T. Jennings (signed by VR with permission)

Brian T. Jennings
Special Agent
Federal Bureau of Investigation

Sworn to before me through reliable electronic means
this 22nd day of November, 2024.


THE HONORABLE VICTORIA REZNIK
United States Magistrate Judge
Southern District of New York